

Defamilisation and Leave Policies – A Comparative Study of 14 East Asian and Non-East

Asian Countries (Paper accepted by Journal of Asian Public Policy on 20 Apr 2017)

Ruby C M Chau (Corresponding Author)

Marie Curie Research Fellow

Department of Sociological Studies, University of Sheffield, Elmfield Building,
Northumberland Road, Sheffield S10 2TU, UK Email: c.chau@sheffield.ac.uk
Tel: +44 114 2226848

Liam Foster

Senior Lecturer in Social Policy and Social Work

Department of Sociological Studies, University of Sheffield, Elmfield Building,
Northumberland Road, Sheffield S10 2TU, UK Email: l.foster@sheffield.ac.uk
Tel: +44 114 2226434

Sam W K Yu

Associate Professor

Department of Social Work, Hong Kong Baptist University, Renfrew Road, Kowloon Tong,
Hong Kong
Email: samyu@hkbu.edu.hk Tel: +852 34115511

Abstract

This article joins the international debate on whether there is a unique East Asian welfare model. It examines the concept of defamilisation and compares various leave policies (maternity leave, paternity leave and extended parental leave) in five East Asian and nine non-East Asian countries. The welfare index method is used to classify these countries into different groupings. The findings show that the East Asian countries are not always internally homogeneous (being similar in key features), nor are they externally heterogeneous (showing significant differences from the others). Therefore, the existence of a unique East Asian welfare model is still in doubt.

Keywords

Defamilisation; East Asian welfare model; external heterogeneity, internal homogeneity, leave policies

Introduction

There is an expanding volume of studies on leave policy measures for workers with dependent children (Javornik 2014; Yu et al, 2014). These measures are significant defamilisation/familisation instruments which assist these workers to tackle the challenges of reconciling paid work and unpaid care in the family (Bambra 2004, 2007; Daly 2011; Esping-

Andersen 1999; Korpi 2000, 2010). This paper focuses on comparing three types of paid leave policy measures (maternity leave, father only leave and extended parental leave) in five East Asian countries/territories (Hong Kong, Japan, Korea, Singapore and Taiwan) and nine non-East Asian countries (Finland, France, Germany, Italy, Luxemburg, Portugal, Spain, Sweden and the UK). In doing so leave measures are utilized to inform debates surrounding the existence of an all-encompassing welfare model in East Asia.

The paper is organized into seven parts. The first part discusses the importance of the study of welfare models in general and welfare model(s) in East Asia in particular. Second, it examines the current debates on the existence of an all-encompassing East Asian welfare model. The third part discusses why the study of defamilisation measures with specific reference to leave policies is relevant to such debates. The fourth part details the leave policy measures while the fifth outlines the methods employed to study these measures in the five East Asian countries and nine non-East Asian countries. Using the comparative data concerning leave measures as an example, the sixth part indicate the problematic nature of claims that the five East Asian countries could form a unique welfare model. It is followed by the conclusion that apart from geographical locations and cultural heritages, multiple factors should be considered in seeking explanations for the similarities and differences between welfare systems.

Welfare Models

Studies of welfare models occupy an important place in the field of comparative welfare research. Over the past few decades, a number of welfare modelling studies have been conducted (Powell and Barrentos 2011). For example, as early as the 1950s, Wilensky and Lebeaux (1958) introduced the residual and institutional welfare model while more recently

Esping-Andersen (1990) used an influential welfare regimes model. These welfare modelling studies make important contributions to comparative welfare studies shedding light on ideologies and policy measures stressed by different countries (Aspalter 2006).

Esping-Andersen (1990) identified three welfare models – conservative, social democratic and liberal regimes. Esping-Andersen (1997) argues that these models are associated differently with the decommodification of labour principle. Over the past three decades, many studies have been conducted on the applicability of these three models to the study of welfare arrangements in different countries (Ferge 2001; Powell and Barrientos 2011). Despite the significant contributions of Esping-Andersen's work, it is not without criticism. One major criticism is that Esping-Andersen's decision to organize the principle of classification is not sensitive to gender issues (Daly 1994; Lister 1994; Sainsbury 1999; Korpi 2000, 2010). Given that women are more likely to use welfare services this is a considerable omission. This concern has led to studies on the importance of defamilisation measures in influencing the gender division of labour in the family and the division of the responsibility for providing welfare between the family and government (Esping-Andersen 1999; Leitner 2003; Bambra 2004, 2007; Kroger 2011).

Another main criticism is that Esping-Andersen's work has not paid sufficient to welfare models upheld in East Asia (Jones 1993; Holliday and Wilding 2003; Lee and Ku 2007; Yu, 2012). Some analysts argue that studies of welfare models in East Asian countries may help to identify alternatives to the three models proposed by Esping-Andersen (Holliday 2000; Yu, 2014). They can enhance understanding of the differences and similarities in welfare arrangements between East Asian and Western countries. Walker and Wong (2004) argue that over-estimating the differences in the welfare arrangements in East Asian and Western

countries may lead to an oversight of the relevance of the East Asian experience of organizing welfare to Western countries; whereas underestimating the differences in welfare arrangements between East Asian and Western countries may hinder analysts from discovering new ways of meeting welfare needs (Yu et al, 2014). This criticism has generated increasing research attention in whether a unique East Asian welfare model exists and, if it exists, its particular features. However there is little consensus on these matters in current debates (Ku and Jones-Finer 2007; Yu et al, 2015; Abrahamson 2017).

The Existence of an East Asian Welfare Model?

Some analysts (Jones 1993; Holliday 2000; Aspalter, 2006; Karim *et al.* 2010) believe that an East Asian welfare model exists. Aspalter (2006) points out that welfare arrangements in Hong Kong, Japan, Korea, Singapore and Taiwan have sufficient commonalities to form an East Asian welfare model, which emphasize the vital role of the family in welfare provision. Karim *et al.* (2010, p.46) state that:

The East Asian welfare regime (sometimes referred as Confucian) can be characterized by a residual approach, where there is low level of government intervention and investment in social welfare, underdeveloped public service provision with a strong reliance on family and voluntary sector in welfare provision.

This kind of the East Asian welfare model is seen as a ‘family-centred residual welfare model’ because the family is assumed to be largely responsible for providing welfare whereas the state assumes a more limited role (Leung 2014).

However, not all analysts agree on the existence of an East Asian welfare model. For instance, those support the convergence thesis stress the importance of global challenges in shaping the

development of welfare in individual countries (Hirst and Thompson 1996). These challenges include the economic uncertainties caused by the increasing number of stateless enterprises and the flexible labour market, in addition to demographic changes (Castles 2002; Foster, 2014). In response to these challenges, it is common for governments in both East Asia and the West to promote welfare retrenchment, individual responsibilities for providing welfare and the primary role of the market in the production and allocation of wealth (Naegele and Walker 2007; Chau et al 2017).

Other analysts also throw doubts to the existence of an all-encompassing East Asian model on the basis of the diverse welfare arrangements among East Asian countries. For example, Kwon (2005, p. 17) argues that 'Korea and Taiwan moved toward the inclusive type of the developmental state while Singapore and Hong Kong maintained the main characteristics of their selective welfare states'. Kim (2008) contends that Taiwan and Korea are keen to develop social insurance schemes based on social rights, whereas Singapore and Hong Kong rely mainly on a funded scheme and public assistance system to meet people's financial needs. Choi (2012) stresses that Japan can be regarded as part of a productivist welfare regime whereas Korea should be classified as a welfare state regime with strong liberal characteristics.

In studying the existence of an East Asian model, some analysts stress the importance of empirical evidence (Ku and Jones Finer 2007). In studying whether there is an East Asian welfare model in the field of health care, Yu (2012) stressed the importance of finding empirical evidence concerning 'internal homogeneity' and 'external heterogeneity'. The former refers to significant similarities between East Asian countries; and the latter refers to significant differences between East Asian and non-East Asian countries. As such, this paper explores leave policies, associated with defamilisation, in various countries to consider these

characteristics.

Defamilisation Measures

Lister (1997, p.173) has presented a widely-quoted definition of defamilisation: ‘the degree to which individual adults can uphold a socially acceptable standard of living, independently of family relationships, either through paid work or through social security provision’. How much freedom gained by women (or men) from the family depends not only on the types of social policies accessible to them but also on whether they can survive as independent workers in the paid labour market (Bambra 2007). In other words, an important way to reduce women’s (or men’s) reliance on the family is to assist them to opt into work (Kroger 2011). Government’s measures such as public child-care services, carers’ allowances and leave policy measures are intended to create favourable conditions for long-term participation in the paid labour market and represent important defamilisation measures (Bambra 2004, 2007; Korpi 2010; Saraceno and Keck 2010; Thevenon 2013).

In comparing the government’s defamilisation measures in different countries, Leitner (2003) has developed four ideal types of familialism – explicit familialism, optional familialism, implicit familialism and defamilialism. The ideas of these concepts have been summarized by Michon (2008) as follows:

- a. explicit familialism is marked by countries actively supporting the family in its caring functions;
- b. optional familialism stresses that institutional structures allow the family to choose whether to provide care to its members or shift caring responsibilities to the state or market;

- c. defamilialism is marked by structures offering care services by the state; market and voluntary sector on the one hand; and lack of family care support on the other; and
- d. implicit familism means that the family remains neither actively supported in its caring function nor given an option to be unburdened from caring responsibilities.

It is important to note that implicit familism is similar to the family-centred residual welfare model. As discussed above, this is what some analysts have used to refer to an East Asian model, if it exists. Hence, if features of implicit familism are commonly shared by East Asian countries, this may imply a great extent of internal homogeneity among these countries and therefore the existence of an all-encompassing East Asian welfare model.

It is evident that a number of western governments regard defamilisation measures as important policy instruments, not only for promoting the welfare of women, but also for responding to the challenges many women face in relation to managing work and care responsibilities (Hemerijck 2015; Saraceno 2015). Similar challenges also exist in East Asian countries (Chau and Yu, 2013; Leung 2014). In order to respond to these challenges, some women delay their marriages or choose not to marry and have children to avoid having to undertake caring roles traditionally expected of women. In Hong Kong, the number of females aged 15 and above who were never married steadily increased from 2000 to 2010 by around 19% (Women's Commission 2011) and the crude birth rate dropped from 16.8 in 1981 to 7.4 in 2009 (Wong *et al.* 2011). While in Singapore, the median age of marriage for women increased from 23.7 in 1970 to 27.2 in 2007 (Teo 2010) and the total fertility rate dropped from 3.03 to 1.42 between 1970 and 2001 (Teo and Yeoh 1999; Wong and Yeoh 2003). In 2010 the average age of mothers at first childbirth in Taiwan had increased by 6.1 years since 1980 (Chen 2012) and fertility rates declined (Lin *et al.* 2011).

Some defamilisation measures such as maternity leave, parental leave and paternity leave are used in western countries (to a variable extent) to facilitate women to meet the expectations as a worker and care provider (Bambra 2004, 2007; Chzhen 2010; Daly 2011). If defamilisation measures used by the East Asian countries, which also represent a response to demographic and economic issues, are similar to those used by Western countries this suggests that in the context of leave measures an all-encompassing East Asian welfare model may not exist. However, if the responses of the East Asian countries have important variations from the Western countries, then this could imply that the welfare arrangements between East Asian countries are marked by significant heterogeneity in relation to leave policies.

Leave Policy Measures

Before discussing the comparative data concerning the different forms of leave provided by the five East Asian and nine non-East Asian countries, this section provides an overview of these measures.

Paid maternity leave is a form of employment-protected leave for mothers around the time of childbirth (Dearing, 2016). This kind of leave is understood to be a health and welfare measure intended to give health protection to both mother and child (Koslowski, *et al.* 2016). The International Labour Organisation (ILO) suggests that its members should provide 14 weeks of maternity leave with a wage replacement ratio no less than two thirds of women's previous earnings (Addati 2015). This suggestion was practised in 57 countries in 2015 (Addati 2015). Analysts argue that paid maternity leave can help women keep their job and provide care to their young child (Ciccia and Verloo 2012). Studies indicate that very short and very long paid

maternity leave policies have a slightly positive effect on women's employment participation and working hours, whereas moderate durations have a large positive effect (Dearing, 2016). Unlike other measures (such as parental leave) designed to support families to look after children, maternity leave benefits are provided exclusively to women. Hence, the provision of paid maternity leave can play an important role in shaping the gender division of labour in the family as it is seen as recognition of women's individual rights, not only to look after their child, but also to develop their career.

Paid father only leave refers to leave benefits that are available to the father. These benefits are individualized and non-transferable. If the father does not take them, they will be lost to the family (Haas and Rostgaard 2011). The importance of the paid father only leaves in influencing the gender division of labour in the family is widely recognized. Haas and Hwang (2008) point out that state incentives for father's use of leave affect active fatherhood through the family cycle.

There is a lack of consensus on the definition of paid extended parental leave. In this paper, it refers to a combination of three elements (paid maternity leave, paid paternity leave, and paid parental leave that is intended to give parents the opportunity to spend time caring for a young child). According to Koslowski *et al.* (2016), paid parental leave can be provided to mothers and fathers, either as a non-transferable individual right or as an individual right that can be transferred to the other parent; or as a family right that parents can divide between themselves as they choose. Paid extended parental leave has the potential to make a fundamental change to attitudes regarding gender, parenting and work because it is associated with a normative message that the government (and employers) should share the responsibility for assisting parents to carry out this important task (Haas 2003).

Methodology

The rest of the paper draws on the information largely provided by the ILO (Addati *et al.* 2014), which conducted a comparative review of national legislative provisions on maternity and paternity protection at work in 185 countries and territories, and the International Network on Leave Policies and Research in a report edited by Koslowski *et al.* (2016). Where there are information gaps in specific policy measures or countries, national sources of information have been used to supplement these. The intention is not to provide a comprehensive comparison on paid leave policies between all East Asian countries and all non-East Asian countries. Instead we focus on fulfilling two purposes: (1) to collect evidence of significant differences in ways of providing well-paid leave policy measures between the five East Asian countries, and (2) to collect evidence of significant similarities between these five East Asian countries and non-East Asian countries in providing parental leave policy measures. The five East Asian countries are Hong Kong, Singapore, Taiwan, Korea and Japan. The nine non-East Asian countries are Finland, France, Germany, Italy, Luxembourg, Portugal, Spain, Sweden and the UK. While the aim is not to consider the merits or limitations of Esping-Anderson's (1990) classification in relation to European countries we have deliberately ensured that we have included countries politically 'Liberal', 'Corporatist' and 'Social-Democratic' regimes. There are three further reasons for focusing on these nine non-East Asian countries. Firstly, as with the five East Asian

countries, they belong to the very high human development group (United Nations 2016).

Secondly, there is high quality comparable data available in these countries. Thirdly, they have a variety of ways of providing paid leave. This leave policy information in relation is set out in Table 1.

In addition, further Tables (2-5) compares the length of different types of well-paid leave as defined by the ILO (Addati *et al.* 2014) by using the welfare index method. With reference to the ideas of the ILO (Addati *et al.* 2014) and Dearing (2016), well-paid leave refers to leave that is paid at a high flat rate of at least Euro 1,000 per month or two thirds or more of earnings. This welfare index method was advocated by Esping-Anderson (1990) and has been replicated by other scholars such as Bambra (2004). The method is based on the numerical description of the relationship of an individual country's score to the mean (and standard deviation) for the factors that makes up the index. On the basis of this relationship, a score for low, medium and high is given. While this methodology has certain drawbacks, such as the use of averaging (Castles and Mitchell 1993), when combined with the country specific information regarding leave policies data it provides a useful overview of the differences and similarities within and between the East Asian and non-East Asian countries.

However, it is important to note that focusing on studying leave policy measures is not without limitations. Most of the comparative data about leave policy measures available is concerned with the policy designs with only limited data concerning the take-up rate available (Koslowski *et al.* 2016). As such this paper does not incorporate take-up rates.

Comparing Leave Measures in Five East Asian Countries

There are significant differences in the ways that the five East Asian governments implement the well-paid maternity, fathers only and extended parental leave. Table 1 shows that only Japan and Singapore carry out the ILO's suggestions regarding maternity leave. Japan and Singapore are more generous than the other three East Asian countries in their provision of well-paid father only leave. While there is no paternity leave in Japan, fathers can take 180 days of well-paid parental leave. By applying for paternity leave, extended care leave and paternity leave, fathers in Singapore may claim 54 days of well-paid father only leave. On the contrary, the Hong Kong government only provides a father with 3 days of paid paternity leave and no government-mandated parental leave. Table 1 shows that unlike Hong Kong, Taiwan and Korea provide parental leave for fathers but their leave measures are not well-paid as defined by the ILO. Those fathers who join the social insurance scheme in Taiwan are entitled to six months of paid parental leave but the wage replacement ratio of this leave is 60% rather than two-thirds of the ordinary salary (Bureau of Labour Insurance 2016). Fathers in Korea can claim one year of paid parental leave but the wage replacement ratio (40%) of this leave is even lower than that in Taiwan. There is also great variation in the length of well-paid extended parental leave in the five East Asian countries – Japan (458 days), Singapore (214 days), Korea (93 days), Hong Kong (73 days) and Taiwan (66 days) (Table 1). The length of this leave in Japan is 6 times greater than that in Hong Kong and Taiwan.

Table 1 Three Types of Well Paid Leave Measures in 14 Countries

Country	Maternity Leave (A)	Father-targeted leave (B)	Government-mandated paid extended parental leave (A + B + other forms of well paid parental leave)
Finland	105 days	54 days	317 days
France	112 days	11 days	123 days
Germany	98 days	12 months (365 days)	818 days
Hong Kong	70 days	3 days	73 days

Italy	140 days	2 days	142 days
Japan	98 days	180 days	458 days
Korea	90 days	3 days	93 days
Luxembourg	112 days	6 months (182 days)	467 days
Portugal	150 days	25 days	175 days
Singapore	112 days	54 days	214 days
Spain	112 days	15 days	127 days
Sweden	98 days	205 days	498 days
Taiwan	61 days	5 days	66 days
United Kingdom	273 days	14 days	462 days

(Sources: Labour Department, HKSAR, 2016; Koslowski *et al*, 2016; Ministry of Manpower, Singapore Government, 2016; Bureau of Labor Insurance, Ministry of Labor, 2016; Laws & Regulations Database of the Republic of China, 2016; table compiled by Author)

Comparing Leave Measures in East Asian and Non-East Asian Countries

Important similarities in the ways that leave measures are provided in some East Asian and non-East Asian countries are evident. As with Japan and Singapore, all of the nine non-East Asian countries meet the suggestions made by the ILO regarding maternity benefits (Table 1). In fact, Germany and Sweden have exactly the same length of well-paid maternity leave as Japan (98 days); and Luxembourg, Spain and France have exactly the same length of well-paid maternity leave as Singapore (112 days). The view that some East Asian countries and non-East Asian countries have similarities in their ways of providing well-paid maternity leave is further reinforced by the evidence gained from the classifications of the 14 countries into three groups based on the welfare index method. As shown in Table 2, the five East Asian countries do not concentrate in the same group. Japan, Korea and Singapore are in the medium score group whereas Hong Kong and Taiwan are in the low score group. In addition to the three East Asian countries, six non-East Asian countries are also in the medium score group.

Table 2 Grouping by Length of Well-Paid Maternity Leave

Country	Length	Score*
Finland	105 days	Medium
France	112 days	Medium
Germany	98 days	Medium
Hong Kong	70 days	Low
Italy	140 days	High
Japan	98 days	Medium

Korea	90 days	Medium
Luxembourg	112 days	Medium
Portugal	150 days	High
Singapore	112 days	Medium
Spain	112 days	Medium
Sweden	98 days	Medium
Taiwan	61 days	Low
United Kingdom	273 days	High
Mean [#]	108.1	
Standard deviation [#]	20.3	

Notes:

[#]Adjusted for extreme outliers (Taiwan and UK)

*high > Mean+SD; medium between (Mean-SD) and (Mean+SD); Low < Mean-SD

The data in Table 1 shows some similarities in the well-paid father only leave provided by some East Asian and non-East Asian countries. For example, Hong Kong and Italy provide no more than three days of this form of leave. The difference between the length of well-paid father only leave in Luxembourg and Japan is no more than two days (see Table 1). The view that East Asian and non-East Asian countries have similarities in their ways of providing well-paid father only leave is further reinforced in Table 3 which classifies the 14 countries into three groups based on the welfare index method. This shows that the five East Asian countries are spread into three groups. Japan is located in the high score group, Singapore is in the medium score group while Hong Kong, Korea and Taiwan are in the low score group. The nine non-East Asian countries are also spread into three different groups with Germany, Luxembourg and Sweden in the high score group; Finland, France, Portugal and Spain in the medium score group; and Italy and the UK in the low score group. This implies that in terms of the length of the well-paid father only leave, Japan has more similarities with Germany and Sweden than with the other four East Asian countries; Singapore has more similarities with Finland, France, Portugal and Spain than with the other four East Asian countries. Following the same logic, we should not overlook the similarities between Hong Kong, Korea, Taiwan, Italy and the United Kingdom.

Table 3 Grouping by Length of Well-Paid Father Only Leave

Country	Length	Score*
Finland	54 days	Medium

France	11 days	Medium
Germany	365 days	High
Hong Kong	3 days	Low
Italy	2 days	Low
Japan	180 days	High
Korea	3 days	Low
Luxembourg	182 days	High
Portugal	25 days	Medium
Singapore	54 days	Medium
Spain	15 days	Medium
Sweden	205 days	High
Taiwan	5 days	Low
United Kingdom	14 days	Low
Mean [#]	82.2	
Standard deviation [#]	77.2	

Notes:

[#]Adjusted for extreme outliers (Germany, Hong Kong, Italy, Korea and Taiwan)

*high > Mean+SD; medium between (Mean-SD) and (Mean+SD); Low < Mean-SD

The 14 countries have been classified into three groups in terms of the length of the well-paid extended parental leave based on the welfare index method. Given that well-paid maternity leave and well-paid father only leave are some of the components of the well-paid extended leave it is not surprising that the five East Asian countries do not concentrate in one group (see Table 1). Table 4 shows that when the welfare index method is employed Hong Kong, Taiwan and Korea are in the low score group. Singapore is in the medium group with five non-East Asian countries (Finland, France, Italy, Portugal, and Spain) while Japan is in the high score group with Germany, Luxembourg, Sweden, and the United Kingdom.

Table 4 Grouping by Length of Well-paid Extended Parental Leave

Country	Length	Score*
Finland	317 days	Medium
France	123 days	Medium
Germany	818 days	High
Hong Kong	73 days	Low
Italy	142 days	Medium
Japan	458 days	High
Korea	93 days	Low
Luxembourg	467 days	High
Portugal	175 days	Medium
Singapore	214 days	Medium
Spain	127 days	Medium
Sweden	498 days	High
Taiwan	66 days	Low

United Kingdom	462 days	High
Mean [#]	262.4	
Standard deviation [#]	159.5	

Notes:

[#]Adjusted for extreme outliers (Germany and Taiwan)

*high > Mean+SD; medium between (Mean-SD) and (Mean+SD); Low < Mean-SD

The 14 countries have been re-categorised based on the three types of classification results (see Tables 5 and 6). Hong Kong and Taiwan are members of Category 1 (scoring Low, Low and Low in all three types of leave), which is marked by limited commitment to well-paid maternity and father only leave. Korea is the only country in Category 2 (scoring Medium, Low and Low in the three types of leave respectively). Singapore is in the same category (3) as Finland, France and Spain (scoring Medium, Medium and Medium). This category is characterized by a moderate commitment to the provision of well-paid maternity and father only leave. Japan is in the same category (4) as Germany, Luxemburg and Sweden (scoring Medium, High and High). This category is marked by a greater commitment to well-paid extended parental and father only leave. The UK (scoring High, Low and High), Italy (scoring High, Low and Medium) and Portugal (scoring High, Medium and Medium) are highly committed to the provision of the well-paid maternity leave with rather more varied commitments to well-paid father only and extended parental leave.

Table 5 Combined Results of Three Grouping Exercises

Country	Score by Lengths of Well-paid Maternity Leave	Score by Well-paid Father Only Leave	Score by Well-paid Extended Parental Leave
Finland	Medium	Medium	Medium
France	Medium	Medium	Medium
Germany	Medium	High	High
Hong Kong	Low	Low	Low
Italy	High	Low	Medium
Japan	Medium	High	High
Korea	Medium	Low	Low
Luxembourg	Medium	High	High
Portugal	High	Medium	Medium

Singapore	Medium	Medium	Medium
Spain	Medium	Medium	Medium
Sweden	Medium	High	High
Taiwan	Low	Low	Low
United Kingdom	High	Low	High

As mentioned in the previous sections, different leave policy measures are associated with different normative messages. Paid extended parental leave policy measures convey a message that the government has an important role in assisting people to manage care for children. Paid maternity leave is associated with the recognition of women's individual rights to look after their child and to pursue their career, while paid father only leave is associated with the principle of facilitating father's role in providing care in the family. Following this logic, it is reasonable to argue that different groups (and countries within them) linked to different combinations of the classification results are associated with different normative messages.

Table 6 Seven Categories deriving from the Combined Results

Category	Grouping Results by Three Types of Well Paid Leave Measures	Countries
1	Low, Low and Low	Hong Kong and Taiwan
2	Medium, Low and Low	Korea
3	Medium, Medium and Medium	Singapore, Finland, France and Spain
4	Medium, High and High	Japan, Germany, Luxemburg and Sweden
5	High, Low and High	UK
6	High, Low and Medium	Italy
7	High, Medium and Medium	Portugal

Given that there are important differences between the five East Asian countries in their leave provision, and the fact that some East Asian and non-East Asian countries can be classified into a group, it is evident that the study of the leave measures provides support to the view that there is a lack of sufficient internal homogeneity and external heterogeneity to identify the five East Asian countries as forming an all-encompassing welfare model. As previously stated, it is important to recognize that there can be a gap between how leave measures are designed and

responses of potential users. Whether people utilize leave depends on a number of factors, not least how well the leave is paid, the division of caring responsibilities between men and women in the family, and potential users' (and their spouses') employment status (Bambra 2007; Michon 2008; Addati 2015; Dearing 2016; Koslowski *et al.* 2016). Although there is a lack of comprehensive data concerning the take-up rate of leave measures, some evidence drawn from literature supports these observations. For instance, since 2002, when Employment Insurance started to pay maternity leave subsidies in Korea, the number of workers taking maternity leave has increased from 22,711 in 2002 to 95,259 in 2015 (Kim 2016). However, men in East Asian countries take less leave than they are legally entitled to. In Singapore, the take-up rate for paternity leave was only 42% in 2015 (Channel NewsAsia 2016) and in Japan, only 2.3% of male workers whose spouse gave birth between 1 October 2012 and 30 September 2013 had started or applied for parental leave by October 2014. Moreover, many took less than one month of leave (Nakazato and Nishimura 2016). In Korea, the proportion of male employees among the total number of employees taking parental leave in 2015 was only 5.6% (Kim 2016). Won (2007) argues that some Korea men feel that taking leave would put their jobs and their reputations as men at risk. In Hong Kong pressure groups believe that the risk of being unreasonably dismissed by employers affects the take-up rate of leave (Mingpao 2008). In Taiwan only 53% of female workers resumed their work six years after giving birth to their baby (Directorate-General of Budget, Accounting and Statistics 2013). indicating a number of female workers choose not to go back to work after their maternity leave ends.

In order to increase the take-up rate of leave policies a number of measures could be put into practice. Including making leave compulsory (such as France did in relation to maternity leave) (Fagnani *et al.* 2016), increasing the wage replacement ratio or introducing a quota (since

Sweden introduced a father's quota in 1995 more fathers are taking leave in Sweden (Haas *et al.* 2016).

Conclusion

By studying three types of paid leave policy measures (maternity, father-only and extended parental) utilizing comparative parental leave data and a welfare index method in five East Asian and nine non-East Asian countries, it is evident that there is a lack of sufficient evidence to suggest that an all-encompassing East Asian welfare model exists. The analysis indicates that the five East Asian countries explored do not represent an internally homogeneous group (consisting of significant similarities) or an externally heterogeneous group (with significant differences from the non-East Asian countries). As such, attempts to explain the similarities and differences between welfare systems in different parts of the world should not be assumed to be strongly associated with geographical location or cultural heritage.

It is important to explore other characteristics, including ideological and economic factors, and how they may impact on parental leave policies. This ultimately has implications for the extent to which childcare is financially rewarded, the level to which it is perceived to be a women's responsibility and on access to the labour market. Adequate defamilisation policies and practices, including leave policies, are important mechanisms through which the state can assist

women to achieve financial independence and reduce the financial penalties associated with childrearing. At the same time, despite the emergence of greater provision of fathers' leave, it is apparent that women are still more likely to undertake caring responsibilities than their male counterparts (Koslowski *et al.* 2016). Therefore, it is not only the provision of policy measures which warrants attention but also the gendered division of take-up of such policies in limiting the financial implications of childcare on women. As such, while there is evidence that an East Asian welfare model does not exist in relation to leave policy design, there is more work to be done to explore the extent to which leave policies are accessed and operationalized in practice.

Note

1. Hong Kong is a special administrative region under Chinese rule. The independent status of Taiwan has been disputed by the Chinese government. Despite their special political circumstances, they are both referred as countries in this paper because of their highly independent welfare systems.

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